

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN ALMICAR CABALLERO,
aka "Chapo,"
aka "chapofromthemurda,"
JOSELYN DESTINY VILLALOBOS,
NICOL CLYDE EDMUND,
aka "Nicholas Clyde Edmund,"
and
JOSHUA ISAIAH JESTER,

Defendants.

ED CR No. 5:23-cr-00142-ODW

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 922(a)(1)(A): Engaging
in the Business of Dealing in
Firearms Without a License;
21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii): Distribution of
Methamphetamine; 18 U.S.C.
§ 922(g)(1): Felon in Possession
of Firearms and Ammunition;
21 U.S.C. §§ 861(a), (d): Use of
Persons Under the Age of 18 in
Drug Operations; 21 U.S.C. § 853,
18 U.S.C. § 924(d)(1), 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATION

At times relevant to this Indictment, defendants JONATHAN
ALMICAR CABALLERO, also known as ("aka") "Chapo," aka

1 "chapofromthemurda," JOSELYN DESTINY VILLALOBOS, NICOL CLYDE EDMUND,
2 aka "Nicholas Clyde Edmund," and JOSHUA ISAIAH JESTER did not have a
3 federal firearms license issued by the United States Bureau of
4 Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and thus were not
5 licensed to import, manufacture, or deal in firearms.

6 B. OBJECT OF THE CONSPIRACY

7 Beginning on an unknown date, but no later than on or about
8 August 3, 2022, and continuing to on or about June 29, 2023, in
9 Riverside County, within the Central District of California, and
10 elsewhere, defendants CABALLERO, VILLALOBOS, EDMUND, and JESTER
11 conspired with each other and with others known and unknown to the
12 Grand Jury to engage in the business of dealing in firearms without a
13 license, in violation of Title 18, United States Code, Section
14 922(a)(1)(A).

15 C. MANNER AND MEANS OF THE CONSPIRACY

16 The object of the conspiracy was to be accomplished, in
17 substance, as follows:

18 1. Defendant CABALLERO would offer to sell firearms to
19 customers using social media and would coordinate the date, time, and
20 location of the firearms sale.

21 2. Defendant EDMUND and others known and unknown to the Grand
22 Jury would transport firearms from Arizona to defendant CABALLERO to
23 sell to the customers.

24 3. Defendant VILLALOBOS and others known and unknown to the
25 Grand Jury would transport firearms from defendant CABALLERO to
26 customers, complete the sale, and return the money to defendants
27 CABALLERO, EDMUND, JESTER, and others known and unknown to the Grand
28 Jury.

1 4. Defendant JESTER would source firearms from Arizona and
2 provide them to defendants CABALLERO and VILLALOBOS and others known
3 and unknown to the Grand Jury for further sale.

4 D. OVERT ACTS

5 On or about the following dates, in furtherance of the
6 conspiracy and to accomplish its object, defendants CABALLERO,
7 VILLALOBOS, EDMUND, and JESTER, and others known and unknown to the
8 Grand Jury, committed various overt acts within the Central District
9 of California, and elsewhere, including, but not limited to, the
10 following:

11 **August 3, 2022: Sale of a Firearm**

12 Overt Act No. 1: On August 3, 2022, in social media messages,
13 defendant CABALLERO told a person who he believed to be a firearms
14 customer, but who was actually an undercover ATF Agent (the "UC"),
15 that he had firearms for sale.

16 Overt Act No. 2: On August 3, 2022, at defendant CABALLERO's
17 home at 24788 Eucalyptus Avenue, Moreno Valley, California, defendant
18 CABALLERO sold the UC a privately manufactured 9mm caliber pistol for
19 \$1,000.

20 **August 4, 2022: Sale of a Firearm**

21 Overt Act No. 3: On August 3 and 4, 2022, in social media
22 messages, defendant CABALLERO told the UC that he had a firearm for
23 sale.

24 Overt Act No. 4: On August 4, 2022, defendant CABALLERO met
25 with the UC at a location in Riverside, California (the "UC
26 location"), and sold the UC a CZ, Model Scorpion, 9mm caliber pistol,
27 bearing serial number F325102, and thirteen rounds of ammunition for
28 \$2,000.

August 11, 2022: Sale of Two Firearms and Methamphetamine

Overt Act No. 5: On August 11, 2022, in social media messages, defendant CABALLERO told the UC that he had firearms and methamphetamine for sale.

Overt Act No. 6: On August 11, 2022, defendant CABALLERO met with the UC at the UC location and sold the UC two privately manufactured 9mm caliber pistols for \$2,000 and 1,302 grams of methamphetamine for \$3,400.

August 17, 2022: Sale of Five Firearms

Overt Act No. 7: Between August 11 and 17, 2022, in social media messages, defendant CABALLERO told the UC that he had firearms for sale.

Overt Act No. 8: On August 17, 2022, defendant CABALLERO drove with a person unknown to the Grand Jury (the "UF") to deliver firearms to the UC at the UC location. The UF went inside the UC location and met with the UC while defendant CABALLERO waited across the street from the UC location.

Overt Act No. 9: On August 17, 2022, the UF sold the UC the following for \$6,200:

1. A Glock, Model 23, .40 caliber pistol, bearing serial number BWWM645;

2. A Glock, Model 23 Gen5, .40 caliber pistol, bearing serial number BXHR654;

3. A Glock, Model 17, 9mm caliber pistol, bearing serial number BSHD154;

4. A Glock, Model 23, .40 caliber pistol, bearing serial number CKM125US; and

5. A privately manufactured 9mm caliber pistol.

1 Overt Act No. 10: On August 17, 2022, after completing the
2 sale with the UC, the UF left the UC location, met with defendant
3 CABALLERO, and gave him the \$6,200 paid by the UC.

4 **September 12, 2022: Sale of Five Firearms and Methamphetamine**

5 Overt Act No. 11: Between August 17 and September 12, 2022, in
6 social media messages, defendant CABALLERO told the UC that he had
7 firearms and methamphetamine for sale.

8 Overt Act No. 12: Between September 8 and 12, 2022, defendants
9 CABALLERO and EDMUND exchanged text messages wherein defendant EDMUND
10 agreed to transport firearms from Arizona to California and provide
11 them to defendant CABALLERO at an agreed-upon price.

12 Overt Act No. 13: On an unknown date, but no earlier than
13 September 8, 2022, defendant EDMUND traveled from Arizona to
14 California with the following firearms and provided them to
15 defendants CABALLERO and VILLALOBOS:

16 1. A Glock, Model 43, 9mm caliber pistol, bearing serial
17 number BDRF986;

18 2. A Glock, Model 27, .40 caliber pistol, bearing serial
19 number KCL968;

20 3. A Glock, Model 27, .40 caliber pistol, bearing serial
21 number PBF790; and

22 4. A Glock, Model 45, 9mm caliber pistol, bearing serial
23 number BWVL347.

24 Overt Act No. 14: On September 12, 2022, at defendant
25 CABALLERO's direction, defendant VILLALOBOS met with the UC at the UC
26 location and sold the UC the following for \$7,200:

27 1. A Glock, Model 43, 9mm caliber pistol, bearing serial
28 number BDRF986;

2. A Glock, Model 27, .40 caliber pistol, bearing serial number KCL968;

3. A Glock, Model 27, .40 caliber pistol, bearing serial number PBF790;

4. A Glock, Model 45, 9mm caliber pistol, bearing serial number BWVL347;

5. A privately manufactured 9mm caliber pistol;

6. 429 grams of methamphetamine; and

7. Sixteen rounds of ammunition.

Overt Act No. 15: On September 12, 2022, after completing the sale with the UC, defendant VILLALOBOS drove to University Village located at 3740 Iowa Avenue, Riverside, California, and gave defendant CABALLERO the \$7,200 paid by the UC.

Overt Act No. 16: On September 12, 2022, after receiving the money from defendant VILLALOBOS, defendant CABALLERO met with defendants VILLALOBOS and EDMUND in University Village and shared the proceeds of the sale with defendants VILLALOBOS and EDMUND.

September 27, 2022: Sale of Seven Firearms

Overt Act No. 17: Between September 12 and 27, 2022, in social media messages, defendant CABALLERO told the UC that he had firearms for sale.

Overt Act No. 18: On September 26, 2022, defendant EDMUND traveled from the State of Arizona to the State of California with the following firearms and provided them to defendants CABALLERO and VILLALOBOS:

1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol, bearing serial number 22PG-5593;

1 2. A Century Arms International, Model VSKA, 7.62mm caliber
2 pistol, bearing serial number SV7P008780;

3 3. A Glock, Model 27 Gen5, .40 caliber pistol, bearing serial
4 number BXSM651;

5 4. A Glock, Model 27, .40 caliber pistol, bearing serial
6 number AGSP916;

7 5. A Glock, Model 19 Gen3 Mariner, 9mm caliber pistol, bearing
8 serial number BETK845;

9 6. A Glock, Model 43, 9mm caliber pistol, bearing serial
10 number AGLB070; and

11 7. A Glock, Model 43X, 9mm caliber pistol, bearing serial
12 number BKYC559.

13 Overt Act No. 19: On September 27, 2022, at defendant
14 CABALLERO's direction, defendant VILLALOBOS met with a different
15 undercover ATF agent at the UC location and sold the undercover ATF
16 agent the following for \$11,000:

17 1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol,
18 bearing serial number 22PG-5593;

19 2. A Century Arms International, Model VSKA, 7.62mm caliber
20 pistol, bearing serial number SV7P008780;

21 3. A Glock, Model 27 Gen5, .40 caliber pistol, bearing serial
22 number BXSM651;

23 4. A Glock, Model 27, .40 caliber pistol, bearing serial
24 number AGSP916;

25 5. A Glock, Model 19 Gen3 Mariner, 9mm caliber pistol, bearing
26 serial number BETK845;

27 6. A Glock, Model 43, 9mm caliber pistol, bearing serial
28 number AGLB070; and

1 7. A Glock, Model 43X, 9mm caliber pistol, bearing serial
2 number BKYC559.

3 Overt Act No. 20: On September 27, 2022, after completing the
4 sale with the undercover ATF agent, defendant VILLALOBOS traveled to
5 defendant EDMUND's apartment complex at 23415 Hemlock Avenue, Moreno
6 Valley, California, and met with defendants CABALLERO and EDMUND,
7 where they divided the proceeds from the sale.

8 **November 1, 2022: Attempted Sale of a Firearm**

9 Overt Act No. 21: On October 30, 2022, in social media
10 messages, defendant CABALLERO told the UC that he had a firearm for
11 sale, particularly, a "Draco" pistol, and arranged to sell it to the
12 UC on November 1, 2022.

13 Overt Act No. 22: On an unknown date, but no earlier than
14 October 26, 2022, defendant EDMUND traveled from the State of Arizona
15 to the State of California with a Romarm/Cugir, Model Micro Draco,
16 7.62mm caliber pistol, bearing serial number 22PMD-32165 (the "Draco
17 pistol").

18 Overt Act No. 23: Between an unknown date, but no earlier than
19 October 26, 2022, and November 1, 2022, defendant EDMUND maintained
20 the Draco pistol at his apartment in Moreno Valley, California,
21 intending to provide it to defendant CABALLERO to sell to the UC,
22 until law enforcement seized the Draco pistol from defendant EDMUND's
23 apartment on November 1, 2022.

24 **May 25, 2023: Sale of Four Firearms**

25 Overt Act No. 24: On May 24, 2023, in social media messages,
26 defendant CABALLERO told the UC that he would put the UC in touch
27 with one of his firearm sources because defendant CABALLERO had
28 recently been convicted of a felony crime. Defendant CABALLERO then

1 provided him with a phone number for Minor 1, a person under 18 years
2 of age.

3 Overt Act No. 25: On May 24 and 25, 2023, in text messages and
4 phone calls, Minor 1 arranged to sell the UC firearms.

5 Overt Act No. 26: On an unknown date, but no earlier than May
6 24, 2023, defendant JESTER provided defendant CABALLERO and Minor 1
7 with at least one of the firearms listed below.

8 Overt Act No. 27: On May 25, 2023, at defendant CABALLERO and
9 Minor 1's direction, defendant VILLALOBOS met with the UC at the UC
10 location and sold him the following for \$5,200:

11 1. A Glock, Model 19, 9mm caliber pistol, bearing serial
12 number BYEZ500;

13 2. A Glock, Model 19, 9mm caliber pistol, bearing serial
14 number BYUX266;

15 3. A Glock, Model 17 Gen5, 9mm caliber pistol, bearing serial
16 number BHSF423; and

17 4. A Glock, Model 17, 9mm caliber pistol, bearing serial
18 number BYTY545.

19 Overt Act No. 28: On May 25, 2023, after completing the sale
20 with the UC, defendant VILLALOBOS traveled to defendant CABALLERO's
21 home and met with defendants CABALLERO and JESTER, where they divided
22 the proceeds from the sale.

23 **June 7, 2023: Sale of Three Firearms**

24 Overt Act No. 29: On June 7, 2023, in text messages and phone
25 calls, Minor 1 told the UC that he had firearms for sale.

26 Overt Act No. 30: On June 7, 2023, defendant VILLALOBOS drove
27 Minor 1 and the three firearms for the sale to a Chili's at 1490 E.
28 2nd Street, Beaumont, California, to meet with the UC.

1 Overt Act No. 31: On June 7, 2023, Minor 1 met with the UC
2 inside the Chili's and discussed future transactions while defendant
3 VILLALOBOS waited in her car with the three firearms.

4 Overt Act No. 32: On June 7, 2023, Minor 1 and the UC went to
5 the Chili's parking lot, met with defendant VILLALOBOS at her car,
6 and purchased the following for \$5,700 from defendant VILLALOBOS and
7 Minor 1:

8 1. A Glock, Model 26, 9mm caliber pistol, bearing serial
9 number AHRV355;

10 2. A Glock, Model 26, 9mm caliber pistol, bearing serial
11 number ADYV686; and

12 3. A Century Arms International, Model VSKA, 7.62 caliber
13 "Draco" pistol, bearing serial number USD000023.

14 **June 29, 2023: Sale of Six Firearms and Methamphetamine**

15 Overt Act No. 33: Between June 7 and 29, 2023, in a text
16 message, Minor 1 told the UC that he had firearms and methamphetamine
17 for sale.

18 Overt Act No. 34: On June 29, 2023, defendant CABALLERO drove
19 Minor 1 to El Portero Park in Moreno Valley, California, to conduct
20 the sale.

21 Overt Act No. 35: On June 29, 2023, before the planned sale
22 with the UC, defendant CABALLERO and Minor 1 met with defendant
23 JESTER and an unidentified male near the park. Defendant CABALLERO
24 and Minor 1 went inside defendant JESTER's car before defendant
25 CABALLERO got out of defendant JESTER's car, returned to defendant
26 CABALLERO's car, retrieved a bag containing methamphetamine, returned
27 to defendant JESTER's car, and gave the methamphetamine to Minor 1
28 for the planned sale with the UC. Inside defendant JESTER's car,

1 defendant JESTER also gave Minor 1 the following firearms for the
2 planned sale with the UC:

3 1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol,
4 bearing serial number 22PG-6970;

5 2. A Glock, Model 21 Gen4, .45 caliber pistol, bearing serial
6 number AHFR187;

7 3. A Glock, Model 19, 9mm caliber pistol, bearing serial
8 number BYLZ524;

9 4. A Glock, Model 21, .45 caliber pistol, bearing serial
10 number KYU556;

11 5. A Glock, Model 45, 9mm caliber pistol, bearing serial
12 number BYWP609; and

13 6. A Glock, Model 17, 9mm caliber pistol, bearing serial
14 number BYTY484.

15 Overt Act No. 36: On June 29, 2023, after meeting with
16 defendants CABALLERO and JESTER, Minor 1 walked to the park, met with
17 the UC, and sold the UC the following firearms for \$9,300 and the
18 following methamphetamine for \$4,000:

19 1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol,
20 bearing serial number 22PG-6970;

21 2. A Glock, Model 21 Gen4, .45 caliber pistol, bearing serial
22 number AHFR187;

23 3. A Glock, Model 19, 9mm caliber pistol, bearing serial
24 number BYLZ524;

25 4. A Glock, Model 21, .45 caliber pistol, bearing serial
26 number KYU556;

27 5. A Glock, Model 45, 9mm caliber pistol, bearing serial
28 number BYWP609;

1 6. A Glock, Model 17, 9mm caliber pistol, bearing serial
2 number BYTY484; and

3 7. 2,239 grams of methamphetamine.

4 Overt Act No. 37: On June 29, 2023, after completing the sale
5 with the UC, Minor 1 returned to defendant JESTER's car and met with
6 defendants CABALLERO and JESTER to divide the proceeds of the sale.
7 Defendant JESTER then drove defendant CABALLERO and Minor 1 away from
8 the park.

9 Overt Act No. 38: On June 29, 2023, when law enforcement
10 officers attempted to stop defendant JESTER while he was driving away
11 from the park with defendant CABALLERO and Minor 1, defendant JESTER
12 led law enforcement on a high-speed chase before ultimately crashing
13 his car.

COUNT TWO

[18 U.S.C. §§ 922(a)(1)(A), 2(a)]

[ALL DEFENDANTS]

Beginning on an unknown date, but no later than August 3, 2022, and continuing through on or about June 29, 2023, in Riverside County, within the Central District of California, and elsewhere, defendants JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," JOSELYN DESTINY VILLALOBOS, NICOL CLYDE EDMUND, aka "Nicholas Clyde Edmund," and JOSHUA ISAIAH JESTER, aiding and abetting each other and others known and unknown to the Grand Jury, not personally being licensed as importers, manufacturers, or dealers of firearms, willfully engaged in the business of dealing in firearms, specifically, the sales and attempted sales of the following firearms, including firearms of unknown manufacturer and bearing no legitimate manufacturer's mark or serial number (commonly referred to as "ghost guns"), on or about the following dates:

Date	Defendants	Firearms
August 3, 2022	CABALLERO	A privately manufactured 9mm caliber pistol.
August 4, 2022	CABALLERO	A CZ, Model Scorpion, 9mm caliber pistol, bearing serial number F325102.
August 11, 2022	CABALLERO	Two privately manufactured 9mm caliber pistols.

Date	Defendants	Firearms
August 17, 2022	CABALLERO and EDMUND	1. A Glock, Model 23, .40 caliber pistol, bearing serial number BWWM645; 2. A Glock, Model 23 Gen5, .40 caliber pistol, bearing serial number BXHR654; 3. A Glock, Model 17, 9mm caliber pistol, bearing serial number BSHD154; 4. A Glock, Model 23, .40 caliber pistol, bearing serial number CKM125US; and 5. A privately manufactured 9mm caliber pistol.
September 12, 2022	CABALLERO, VILLALOBOS, and EDMUND	1. A Glock, Model 43, 9mm caliber pistol, bearing serial number BDRF986; 2. A Glock, Model 27, .40 caliber pistol, bearing serial number KCL968; 3. A Glock, Model 27, .40 caliber pistol, bearing serial number PBF790; 4. A Glock, Model 45, 9mm caliber pistol, bearing serial number BWVL347; and 5. A privately manufactured 9mm caliber pistol.

Date	Defendants	Firearms
September 27, 2022	CABALLERO, VILLALOBOS, and EDMUND	1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol, bearing serial number 22PG-5593; 2. A Century Arms International, Model VSKA, 7.62mm caliber pistol, bearing serial number SV7P008780; 3. A Glock, Model 27 Gen5, .40 caliber pistol, bearing serial number BXSM651; 4. A Glock, Model 27, .40 caliber pistol, bearing serial number AGSP916; 5. A Glock, Model 19 Gen3 Mariner, 9mm caliber pistol, bearing serial number BETK845; 6. A Glock, Model 43, 9mm caliber pistol, bearing serial number AGLB070; and 7. A Glock, Model 43X, 9mm caliber pistol, bearing serial number BKYC559.
November 1, 2022	CABALLERO and EDMUND	A Romarm/Cugir, Model Micro Draco, 7.62mm caliber pistol, bearing serial number 22PMD-32165
May 25, 2023	CABALLERO, VILLALOBOS, and JESTER	1. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYEZ500; 2. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYUX266; 3. A Glock, Model 17 Gen5, 9mm caliber pistol, bearing serial number BHSF423; and 4. A Glock, Model 17, 9mm caliber pistol, bearing serial number BYTY545.
June 7, 2023	VILLALOBOS and JESTER	1. A Glock, Model 26 Gen5, 9mm caliber pistol, bearing serial number AHRV355; 2. A Glock, Model 26 Gen5, 9mm caliber pistol, bearing serial number ADYV686; and 3. A Century Arms International, Model VSKA, 7.62mm caliber "Draco" pistol, bearing serial number USD000023.

Date	Defendants	Firearms
June 29, 2023	CABALLERO and JESTER	1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol, bearing serial number 22PG-6970; 2. A Glock, Model 21 Gen4, .45 caliber pistol, bearing serial number AHFR187; 3. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYLZ524; 4. A Glock, Model 21, .45 caliber pistol, bearing serial number KYU556; 5. A Glock, Model 45, 9mm caliber pistol, bearing serial number BYWP609; and 6. A Glock, Model 17, 9mm caliber pistol, bearing serial number BYTY484.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

[DEFENDANT CABALLERO]

On or about August 11, 2022, in Riverside County, within the Central District of California, defendant JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," knowingly and intentionally distributed at least fifty grams, that is, approximately 1,302 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(b)]

[DEFENDANT CABALLERO]

On or about September 12, 2022, in Riverside County, within the Central District of California, defendant JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," knowingly and intentionally distributed and willfully caused to be distributed at least fifty grams, that is, approximately 429 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FIVE

[18 U.S.C. § 922(g)(1)]

[DEFENDANT EDMUND]

On or about November 1, 2022, in Riverside County, within the Central District of California, defendant NICOL CLYDE EDMUND, also known as "Nicholas Clyde Edmund," knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

1. A Radical Firearms LLC, Model RF-15, multi-caliber pistol, bearing serial number 21-019553;

2. A Romarm/Cugir, Model Micro Draco, 7.62mm caliber pistol, bearing serial number 22PMD-32165; and

3. Seventeen rounds of Lake City 5.56mm caliber ammunition.

Defendant EDMUND possessed such firearms and ammunition knowing that he had previously been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

1. Robbery, in violation of California Penal Code Section 211, in the Superior Court of the State of California, County of Riverside, case number INF027171, on or about August 4, 1997;

2. Robbery, in violation of California Penal Code Section 212.5, in the Superior Court of the State of California, County of Riverside, case number INF030202, on or about July 26, 2000;

3. Battery of a Peace Officer/Emergency Personnel with Injury, in violation of California Penal Code Section 243(c), in the Superior Court of the State of California, County of Riverside, case number INF035148, on or about July 26, 2000; and

1 4. Assault with a Deadly Weapon on a Peace Officer/Firefighter
2 with Great Bodily Injury, in violation of California Penal Code
3 Section 245(c), in the Superior Court of the State of California,
4 County of Riverside, case number INF048115, on or about May 6, 2009.

COUNT SIX

[18 U.S.C. § 922(g)(1)]

[DEFENDANT CABALLERO]

On or about May 25, 2023, in Riverside County, within the Central District of California, defendant JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," knowingly possessed the following firearms, in and affecting interstate and foreign commerce:

1. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYEZ500;

2. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYUX266;

3. A Glock, Model 17 Gen5, 9mm caliber pistol, bearing serial number BHSF423; and

4. A Glock, Model 17, 9mm caliber pistol, bearing serial number BYTY545.

Defendant CABALLERO possessed such firearms knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Carry Loaded Handgun, in violation of California Penal Code Section 25850(c)(6), in the Superior Court of the State of California, County of Riverside, case number RIF2205079, on or about March 15, 2023.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 861(a); 18 U.S.C. § 2(a)]

[DEFENDANTS CABALLERO AND JESTER]

On or about June 29, 2023, in Riverside County, within the Central District of California, defendants JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," and JOSHUA ISAIAH JESTER, each of whom was at the time at least eighteen years of age, aiding and abetting each other and others known and unknown to the Grand Jury, knowingly and intentionally distributed at least fifty grams, that is, approximately 2,239 grams, of methamphetamine, a Schedule II controlled substance, and, in doing so, knowingly and intentionally employed, hired, persuaded, induced, enticed, and coerced a person under eighteen years of age, namely, Minor 1, to commit such violation.

COUNT EIGHT

[21 U.S.C. §§ 861(a), (d); 18 U.S.C. § 2(a)]

[DEFENDANTS CABALLERO AND JESTER]

On or about June 29, 2023, in Riverside County, within the Central District of California, defendants JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," and JOSHUA ISAIAH JESTER, each of whom was at the time at least eighteen years of age, aiding and abetting each other and others known and unknown to the Grand Jury, knowingly and intentionally employed, hired, persuaded, induced, enticed, and coerced a person under eighteen years of age, namely, Minor 1, to violate Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(viii), as alleged in Count Seven of this Indictment, and did so by knowingly providing and distributing a controlled substance, namely, methamphetamine, to Minor 1.

COUNT NINE

[18 U.S.C. § 922(g)(1)]

[DEFENDANT CABALLERO]

On or about June 29, 2023, in Riverside County, within the Central District of California, defendant JONATHAN ALMICAR CABALLERO, also known as ("aka") "Chapo," aka "chapofromthemurda," knowingly possessed the following firearms, in and affecting interstate and foreign commerce:

1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol, bearing serial number 22PG-6970;

2. A Glock, Model 21 Gen4, .45 caliber pistol, bearing serial number AHFR187;

3. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYLZ524;

4. A Glock, Model 21, .45 caliber pistol, bearing serial number KYU556;

5. A Glock, Model 45, 9mm caliber pistol, bearing serial number BYWP609; and

6. A Glock, Model 17, 9mm caliber pistol, bearing serial number BYTY484.

Defendant CABALLERO possessed such firearms knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Carry Loaded Handgun, in violation of California Penal Code Section 25850(c)(6), in the Superior Court of the State of California, County of Riverside, case number RIF2205079, on or about March 15, 2023.

COUNT TEN

[18 U.S.C. § 922(g)(1)]

[DEFENDANT JESTER]

On or about June 29, 2023, in Riverside County, within the Central District of California, defendant JOSHUA ISAIAH JESTER knowingly possessed the following firearms, in and affecting interstate and foreign commerce:

1. A Romarm/Cugir, Model Mini Draco, 7.62mm caliber pistol, bearing serial number 22PG-6970;

2. A Glock, Model 21 Gen4, .45 caliber pistol, bearing serial number AHFR187;

3. A Glock, Model 19, 9mm caliber pistol, bearing serial number BYLZ524;

4. A Glock, Model 21, .45 caliber pistol, bearing serial number KYU556;

5. A Glock, Model 45, 9mm caliber pistol, bearing serial number BYWP609; and

6. A Glock, Model 17, 9mm caliber pistol, bearing serial number BYTY484.

Defendant JESTER possessed such firearms knowing that he had previously been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year: Carry Loaded Handgun, in violation of California Penal Code Section 25850(c)(6), and Sell or Possess for Sale Alprazolam, in violation of California Health and Safety Code Section 11351, in the Superior Court of the State of California, County of Riverside, case number INF2101743, on or about March 23, 2022.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts Three, Four, Seven, or Eight of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense;

(c) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), or (c).

3. Pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be

1 located upon the exercise of due diligence; (b) has been transferred,
2 sold to, or deposited with a third party; (c) has been placed beyond
3 the jurisdiction of the court; (d) has been substantially diminished
4 in value; or (e) has been commingled with other property that cannot
5 be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One, Two, Five, Six, Nine, or Ten of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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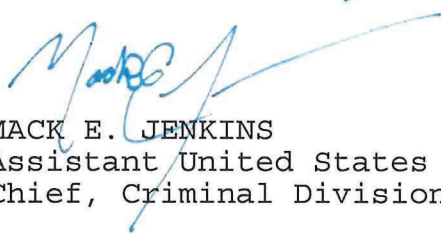
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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3 A TRUE BILL

4
5 15
6 Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 
10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division

13 SEAN D. PETERSON
14 Assistant United States Attorney
15 Chief, Riverside Branch Office

16 JOHN A. BALLA
17 Assistant United States Attorney
18 Deputy Chief, Riverside Branch
19 Office

20 PETER DAHLQUIST
21 Assistant United States Attorney
22 Riverside Branch office
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